

IN THE UNITED STATES DISTRICT COURT **RECEIVED**
FOR THE MIDDLE DISTRICT OF ALABAMA

DIVISION

2006 MAR 24 P 12: 29

Susan H. Guy

Plaintiff

Colonial Bank
Colonial BancGroup

Defendant(s)

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

2:06cv271-WKW

COMPLAINT

1. Plaintiff resides at 974 Lewis Rd, Deatsville, AL 36022
2. Defendant(s)' name(s) Colonial Bank, Colonial BancGroup

Location of principal office(s) of the named defendant(s) Colonial Financial Center
1 Commerce Street
Montgomery, Alabama 36104

Nature of defendant(s)' business Banking and financial
services

Approximate number of individuals employed by defendant(s) 3000+ over 5 states

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).
4. The acts complained of in this suit concern:
 1. ☐ Failure to employ me.
 2. ☒ Termination of my employment.
 3. ☐ Failure to promote me.
 4. ☐ Other acts as specified below: _____

5. Plaintiff is:

- A. ☐ Presently employed by the defendant.
☒ Not presently employed by the defendant. The dates of employment were 7/1/86 - 1/18/05. Employment was terminated because:
- (1) ☒ Plaintiff was discharged.
 (2) ☐ Plaintiff was laid off.
 (3) ☐ Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. ☐ My race.
 B. ☐ My religion.
 C. ☒ My sex.
 D. ☐ My national origin.
 E. ☒ Other, as specified below: my age - I am a
46 year old
female

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are) Robert E. Louder, CEO, white male

Linda Green, Exec. Vice Pres., white female

8. The alleged discrimination occurred on or about 1/18/05.9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows: On 1/18/05, without any forewarning, I was unjustly

terminated and b/c my job had been eliminated due to
reorganization. On the same day, a much younger male
with less experience, and less than 1 year of employment with
Colonial, was promoted to a job with the same duties I had
but with a different ~~same~~ title. This was confirmed by memo
of the same date (1/18/05) to all bank Presidents and Senior management.
Notably, the only terminations in this "reorganization"
were 4 females over the age of 40 and all
were replaced with younger males.

10. The alleged illegal activity took place at 1 Commerce Street
Montgomery, AL 36104

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about 4/13/05. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 12/24/05.
12. I seek the following relief:
- A. ☒ Recovery of back pay.
- B. ☐ Reinstatement to my former job,
- and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorney's fees.

Date: Mar. 24, 2006

Musa H. Guly
Signature of Plaintiff
974 Lewis Road
Dalton, GA 36022
334-569-2567
Address & Telephone Number of Plaintiff